## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA MONROE DIVISION

JILL HINES, ET AL. CIVIL ACTION NO: 3:23-cv-00571

**Plaintiffs** 

**CHIEF JUDGE TERRY A. DOUGHTY** 

VS.

MAG. JUDGE KAYLA D. McCLUSKY

**Defendants** 

ALEX STAMOS, ET AL.

## CONSENT MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS BY CAMILLE FRANÇOIS

Defendant, Camille François, through undersigned counsel, hereby respectfully moves this Court for an Order extending the deadline to respond to the Complaint (ECF 1) filed by Plaintiffs Jill Hines and Jim Hoft ("Plaintiffs"). In support, Defendant represents as follows:

- 1. Plaintiffs filed the Complaint on May 2, 2023.
- 2. Plaintiffs filed an Affidavit of Service on Ms. François on July 7, 2023 (ECF 58) alleging that Ms. François was served with the Complaint on June 30, 2023.
- 3. Undersigned counsel for Ms. François disagrees that the purported service set forth in the Affidavit of Service was proper; however, undersigned counsel agreed to accept service on Ms. François on July 12, 2023. Therefore, responsive pleadings on behalf of Ms. François are currently due on August 2, 2023.
- 4. Ms. François, through undersigned counsel, respectfully requests an extension of the August 2, 2023 deadline to respond to the Complaint until August 14, 2023. This is the first request for an extension of time to respond to the Complaint on behalf of Ms. François.

- 5. By Order of the Court dated June 30, 2023, the deadline for all Defendants to respond to the Complaint is August 14, 2023 (ECF 57).
- 6. Undersigned counsel has contacted counsel for Plaintiffs and counsel for Plaintiffs have agreed that Ms. François may have until August 14, 2023 to respond to the Complaint.

WHEREFORE, Camille François respectfully requests that this Court issue an Order extending her deadline to respond to the Complaint to August 14, 2023.

Respectfully submitted,

## /s/ Camala E. Capodice

Quentin F. Urquhart, Jr. (Bar #14475) Camala E. Capodice (Bar #29117) Gabrielle C. Broders (Bar #39821) 400 Poydras Street, Suite 2700 New Orleans, Louisiana 70130 Telephone: (504) 310-2100

Telephone: (504) 310-2100 Facsimile: (504) 310-2101

Email: qurquhart@irwinllc.com ccapodice@irwinllc.com gbroders@irwinllc.com

Mary E. Gately (pro hac vice)
Samantha L. Chaifetz (pro hac vice) **DLA PIPER LLP (US)** 

500 Eighth Street NW Washington, DC 20004 Telephone: (202) 799-4507

Facsimile: (202) 799-4507

Email: mary.gately@dlapiper.com samantha.chaifetz@us.dlapiper.com

Marie Bussey-Garza (*pro hac vice*) **DLA PIPER LLP (US)** 1650 Market Street, Suite 5000 Philadelphia, PA 19103

Telephone: (215) 656-3300 Facsimile: (215) 656-3301

Email: marie.bussey-garza@us.dlapiper.com

Counsel for Graphika and Camille François

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2023, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

<u>/s/ Camala E. Capodice</u>